

EXHIBIT "A"

FILED
IN CLERKS OFFICE

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MASSACHUSETTS

2004 DEC 3 A 10:54

Plaintiff A, Plaintiff B,
Plaintiff C and Plaintiff D
Others Similarly Situated,
Plaintiffs

*
*
*
*

U.S. DISTRICT COURT
DISTRICT OF MASS.

v.

*
*
*

No. 04CV11022 EFH

WANG, Taihua, Communist Party
Secretary of Anhui Province, and
formerly Governor of Anhui Province
of the People's Republic of China

*
*
*
*

AFFIRMATION OF JANG JEI JAW IN SUPPORT OF THE
APPLICATION TO CLERK FOR ENTRY OF DEFAULT

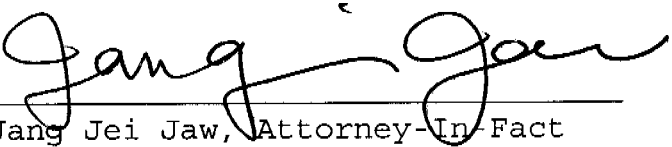
I, JANG JEI JAW, affirm that:

I am one of the attorneys for the plaintiffs in the above-entitled cause and make this Affirmation in support of plaintiffs' application for entry of default.

1. The defendant in the above-entitled case, was properly served on May 24, 2004, with copies of the complaint, summons, and court order granting leave for substitute service.
2. The defendant in the above-entitled case has failed to respond.
3. The applicable time limit pursuant to Fed. R. Civ. P. 55(a) has expired.
4. Copies of the following are attached as exhibits to the enclosed application: all pleadings served on the defaulting parties (Exhibits A and B), and proof of service (Exhibit C and D).

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge and belief.

Dated: 11-24-04

A handwritten signature in black ink, appearing to read "Jang Jei Jaw", written over a horizontal line.

Jang Jei Jaw, Attorney-In-Fact
16 Flintlock Road
Lexington, MA 02420
USA

EXHIBIT "B"

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MASSACHUSETTS

FILED
IN CLERKS OFFICE

2004 DEC -3 A 10:56

U.S. DISTRICT COURT
DISTRICT OF MASS.

Plaintiff A, Plaintiff B, *
Plaintiff C, PLAINTIFF D and *
Others Similarly Situated, *
Plaintiffs *

v. *

WANG, Taihua, Communist Party *
Secretary of Anhui Province, and *
formerly Governor of Anhui Province *
of the People's Republic of China *

No. 04CV11022

APPLICATION TO CLERK FOR ENTRY OF DEFAULT

To the Clerk of the United States District Court for the Eastern
District of Massachusetts:

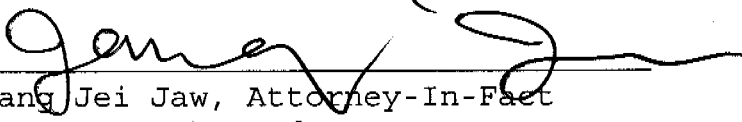
Plaintiff A, B, C and D hereby requests that the Clerk enter
the default of defendant Wang, Taihua for failure to plead or
otherwise defend in a timely manner as provided by Federal Rules
of Civil Procedure, Rule 55(a).

This request is based on the attached affirmation of Jang
Jei Jaw, Attorney-in-Fact which shows the following:

- (1) The defendant was served with the summons and complaint
pursuant to Federal Rules of Civil Procedure, Rule 4(c) on
May 24, 2004, as evidenced by the proof of service on file
with this court, a cop of which is attached to this
application.

- (2) The defendant has failed to plead or otherwise respond to the complaint.
- (3) The applicable time limit for responding has expired.
- (4) A copy of the application has been sent to the defendant on day of November, 2004.

Executed this 24th day of November, 2004, in Lexington, MA.


Jang Jei Jaw, Attorney-In-Fact
16 Flintlock Road
Lexington, MA 02420
USA

UNITED STATES DISTRICT COURT

For The Eastern

District of

Massachusetts

Plaintiff A, Plaintiff B,
Plaintiff JAN, Chun Pey, and
Others Similarly Situated,
Plaintiffs,
V.

SUMMONS IN A CIVIL CASE

WANG, Taihua, Communist Party
Secretary of Anhui Province, and
formerly Governor of Anhui Province
of the People's Republic of China,

CASE NUMBER:

Defendant,

TO: (Name and address of Defendant)

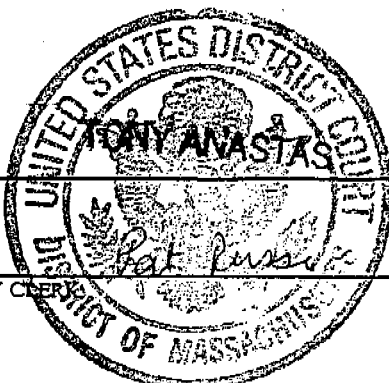
04c 11022 EFH

WANG, Taihua
City of Hefei
Anhui Province
The People's Republic of China

YOU ARE HEREBY SUMMONED and required to serve on PLAINTIFF'S ATTORNEY (name and address)

Jang Jei Jaw
16 Flintlock Road
Lexington, MA 02420
U.S.A.

an answer to the complaint which is served on you with this summons, within 20 days after service of this summons on you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. Any answer that you serve on the parties to this action must be filed with the Clerk of this Court within a reasonable period of time after service.



CLERK

DATE

5-21-04

(By) DEPUTY CLERK

EXHIBIT "D"

AFFIDAVIT OF MAILING

UNITED STATES DISTRICT COURT / BOSTON, MA

Case No. 04CV 11022 EFH -2 P 247

Plaintiff A, Plaintiff B, Plaintiff JAN, Chun Pey, and Others Similarly Situated.

-against-

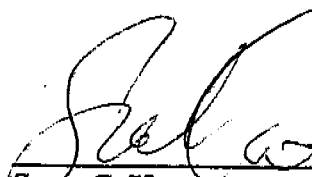
Defendant,
WANG, Taihua, Communist Party
Secretary of Anhui Province, and
formerly Governor of Anhui Province
of the People's Republic of China,

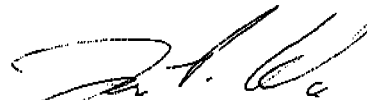
State of Massachusetts, County of Middlesex :
Suan C Kuo

Being duly sworn, deposes and says that he is over the age of 18 years, is not a party to this action and resides in Massachusetts.

MAILING

ON JUNE 10, 2004, Deponent enclosed a copy of the SUMMONS, COMPLAINT in the above matter, in a postpaid sealed wrapper properly addressed to the defendant SECRETARY WANG TAI HUA, THE PROVINCIAL GOVERNMENT, CHANGJIANG ROAD, CITY OF HEFEI, ANHUI PROVINCE, PEOPLE'S REPUBLIC OF CHINA 230001 and deposit said wrapper in a post office - official depository under the exclusive care and custody of DHL Express, within the State of Massachusetts.


Suan C. Kuo


JONES P. WING
Notary Public
Commonwealth of Massachusetts
My Commission Expires
February 24, 2006